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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

NINA AGDAL,

Plaintiff,

v.

DILLON DANIS,

Defendant.

Case No.: 2:23-CV-16873-MCA-MAH

PLAINTIFF'S CERTIFICATE OF SERVICE

As required by this Court's Letter Order dated September 12, 2023 [D.E. 10], Plaintiff Nina Agdal ("Plaintiff") files this Certificate of Service and states as follows:

1. On September 7, 2023, this Court entered an Order imposing temporary restraints upon Defendant and setting a show cause hearing for September 12, 2023, and related pre-hearing deadlines. *See* D.E. 7 (the "Show Cause Order").

2. On September 12, 2023, the Court entered a Letter Order (i) adjourning the show cause hearing until September 19, 2023, and (ii) extending the temporary restraints pending that hearing “and until further Order of the Court.” *See* D.E. 10.

3. The second paragraph of the Letter Order states: “Counsel for Plaintiff is directed to provide Defendant a copy of this Order immediately, via personal service, email and mail service and shall forthwith file a certificate of service with the Court.”

EMAIL

4. On September 12, 2023, at approximately 9:53 a.m. EST, Plaintiff’s counsel emailed Defendant’s manager,¹ John Meehan, attaching the Letter Order and asking that it be forwarded to Defendant or his attorney. Mr. Meehan responded to the email at approximately 2:04 p.m. EST, and stated he was not authorized to accept service of any legal papers on behalf of Defendant. At approximately 4:19 pm EST, Plaintiff’s counsel responded to Mr. Meehan’s email and asked Mr. Meehan to provide Defendant’s email address and cell phone number. At approximately 5:06 pm EST, Mr. Meehan responded that he was not authorized to provide the requested information.

5. Until these emails, Mr. Meehan had not responded to any prior emails from Plaintiff’s counsel asking that the Court filings be provided to Defendant. In fact, it is evident Mr. Meehan previously forwarded any Court filings he had received from Plaintiff’s counsel to Defendant. After sending the prior emails to Mr. Meehan (attaching the Court filings, including the Complaint and motion for temporary restraints, and asking Mr. Meehan to forward the documents to Defendant), Defendant posted on X (formerly Twitter) about the lawsuit, including

¹ Defendant is a mixed martial artist and boxer whose professional affairs are managed by the sports management company Paradigm Sports Management, LLC.

his knowledge that Plaintiff was seeking a temporary restraining order against him. In particular, on September 6, 2023 – within 45 minutes of the first email to Mr. Meehan (attaching, among other things, the Complaint, motion for temporary restraints, supporting declarations, and proposed order) and before the case even was opened – Defendant posted on X about the lawsuit, including his knowledge that Plaintiff was seeking a temporary restraining order. Considering this posting was made before the filing of this lawsuit became public, the only way Defendant could have known about the lawsuit was by receiving the Court filings from Mr. Meehan, who had received them via email from Plaintiff’s counsel.

MAIL

6. On September 12, 2023, Plaintiff’s counsel mailed a copy of the Letter Order to Defendant via Federal Express for overnight delivery at his home address (*i.e.*, the apartment where he resides).²

PERSONAL SERVICE

7. On September 12, 2023, at approximately 2:25 p.m. EST, an investigator from the investigative firm Sage Intelligence Group (“Sage”) attempted to effect personal service of the Letter Order upon Defendant at his home address (along with other Court filings, including the Clerk-issued Summons, Verified Complaint, Memorandum of Law in Support of Motion for Temporary Restraining Order and supporting declarations, Plaintiff’s Proposed Order, the Show

² Among other evidence confirming the address is Defendant’s current residence are (i) interactions between the concierge at the apartment complex and the investigator seeking to personally serve Defendant, described further below, and (ii) Defendant’s X post on September 7, 2023, shortly after personal service had been attempted that day, containing a video clip of home security footage depicting a Sage investigator attempting service outside his front door and stating: “Get the fuck away from my door taking pictures and shit I’m in North Korea [] come find me.”

Cause Order, and the Certificate of Service Plaintiff filed in compliance with the Show Cause Order).

8. Upon entering the apartment complex where Defendant resides, the investigator proceeded to the security desk and spoke with the concierge, an adult male named Zafar, who would not let the investigator go up to Defendant's apartment for the purpose of attempting service upon Defendant. Instead, in the presence of the investigator, the concierge attempted to contact Defendant by calling his apartment, calling him on his cell phone, and texting him. Defendant did not respond.

9. The concierge invited the investigator to leave the Letter Order (and the other Court filings) with him and represented that he (or the concierge on the next shift) would provide them to Defendant. The investigator therefore left the Letter Order (and other Court filings) with the concierge based on that representation.

Dated: September 13, 2023

Respectfully submitted,

SILLS CUMMINS & GROSS P.C.

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